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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TILISHA MORRISON,

Defendant.

CASE NO. 1:22-CR-00177-DAD-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

CURRENT DATE: December 14, 2022
TIME: 1:00 p.m.
COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant TILISHA MORRISON, by and through defendant's counsel of record, Monica Bermudez, hereby stipulate as follows:

1. By previous order, this matter was set for status on December 14, 2022.
2. By this stipulation, defendant now moves to continue the status conference until March 22, 2023, and to exclude time between December 14, 2022, and March 22, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
3. If defendant ultimately does not enter a guilty plea and decides to proceed to trial, the parties agree and stipulate, and request that the Court find the following:
 - a) The government asserts that initial discovery has been provided to counsel. The government is currently processing additional discovery and anticipates production to counsel in

1 the coming days. The government is aware of its ongoing discovery obligations.

2 b) The government is amenable to providing a plea offer if the defendant requests
3 one.

4 c) Counsel for the defendant desires additional time to consult with her client, to
5 review the current charges, to conduct investigation and research related to the charges, to review
6 and/or copy discovery for this matter, to discuss potential resolutions with her client, to prepare
7 pretrial motions, and to otherwise prepare for trial.

8 d) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 e) The government does not object to the continuance.

12 f) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of December 14, 2022 to March 22,
17 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
18 T4], because it results from a continuance granted by the Court at defendant's request on the
19 basis of the Court's finding that the ends of justice served by taking such action outweigh the
20 best interest of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
23 must commence.

24 IT IS SO STIPULATED.

25 Dated: December 7, 2022

26 PHILLIP A. TALBERT
United States Attorney

27 /s/ JESSICA A. MASSEY
28 JESSICA A. MASSEY
Assistant United States Attorney

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2 Dated: December 7, 2022

/s/ MONICA BERMUDEZ

MONICA BERMUDEZ,
Counsel for Defendant
TILISHA MORRISON

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5 **ORDER**

6 IT IS SO ORDERED that the status conference is continued from December 14, 2022, to **March**
7 **22, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe.** Time is excluded pursuant to
8 18 U.S.C. § 3161(h)(7)(A), B(iv).

9 IT IS SO ORDERED.

10
11 Dated: **December 8, 2022**

/s/ *Barbara A. McAuliffe*

UNITED STATES MAGISTRATE JUDGE